

Message

From: Hambrick, Amy [Hambrick.Amy@epa.gov]
Sent: 11/4/2019 9:48:04 PM
To: Brian Boye [Ex: 6 Personal Privacy (PP) @gmail.com]
CC: Marsh, Karen [Marsh.Karen@epa.gov]
Subject: RE: NSPS OOOOa and CEDRI

Brian,

OOOO

OOOO specifies that the reporting format can be determined by the delegated authority. A performance test however must be reported through EPA's Electronic Reporting Tool through CEDRI. It is my understanding that some EPA regions only accept the annual report through email as a PDF for example. Other delegated authorities may accept a hard copy mailed or an electronic format (e.g., spreadsheet) .

60.5420(b)

(b) Reporting requirements. You must submit annual reports containing the information specified in paragraphs (b)(1) through (6) of this section to the Administrator and performance test reports as specified in paragraph (b)(7) or (8) of this section. The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to §60.5410. Subsequent annual reports are due no later than same date each year as the initial annual report. If you own or operate more than one affected facility, you may submit one report for multiple affected facilities provided the report contains all of the information required as specified in paragraphs (b)(1) through (6) of this section. Annual reports may coincide with title V reports as long as all the required elements of the annual report are included. You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period.

(7)(i) Within 60 days after the date of completing each performance test (see §60.8 of this part) as required by this subpart, except testing conducted by the manufacturer as specified in §60.5413(d), you must submit the results of the performance tests required by this subpart to the EPA as follows. You must use the latest version of the EPA's Electronic Reporting Tool (ERT) (see <http://www.epa.gov/ttn/chief/ert/index.html>) existing at the time of the performance test to generate a submission package file, which documents the performance test. You must then submit the file generated by the ERT through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed by logging in to the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). Only data collected using test methods supported by the ERT as listed on the ERT Web site are subject to this requirement for submitting reports electronically. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk or other commonly used electronic storage media (including, but not limited to, flash drives) to EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, you must also submit these reports, including the confidential business information, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator shall submit the results of the performance test to the Administrator at the appropriate address listed in §60.4.

(ii) All reports, except as specified in paragraph (b)(8) of this section, required by this subpart not subject to the requirements in paragraph (a)(2)(i) of this section must be sent to the Administrator at the appropriate address listed in §60.4 of this part. The Administrator or the delegated authority may request a report in any form suitable for the specific case (e.g., by commonly used electronic media such as Excel spreadsheet, on CD or hard copy).

(8) For enclosed combustors tested by the manufacturer in accordance with §60.5413(d), an electronic copy of the performance test results required by §60.5413(d) shall be submitted via email to Oil and Gas PT@EPA.GOV unless the test results for that model of combustion control device are posted at the following Web site: epa.gov/airquality/oilandgas/.

0000a

Reporting through CEDRI will be required, however the e-reporting template is not yet finalized. Please note, while the CEDRI template is still considered draft, the reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website is still considered "draft", the requirement to submit only through CEDRI is not triggered, however during this time it seems most people are finding it easier to submit to CEDRI anyway. Once the report is "final" then CEDRI reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the **[final]** form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

60.5420a(b)

(i) For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (https://www3.epa.gov/ttn/chief/ert/ert_info.html) at the time of the test, you must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>.) Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. If you claim that some of the performance test information being submitted is confidential business information (CBI), you must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

(ii) For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the test, you must submit the results of the performance test to the Administrator at the appropriate address listed in §60.4.

(10) For combustion control devices tested by the manufacturer in accordance with §60.5413a(d), an electronic copy of the performance test results required by §60.5413a(d) shall be submitted via email to Oil and Gas PT@EPA.GOV unless the test results for that model of combustion control device are posted at the following Web site: epa.gov/airquality/oilandgas/.

(11) You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.

Furthermore, as you may know, EPA proposed reconsideration amendments to 0000a (here:

<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/proposed-improvements-2016-new-source>)

and along with these proposed changes EPA has updated the draft reporting template (see “announcements” on the CEDRI website here: <https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>) .

I hope this is helpful,

Amy

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Brian Boyer <brianeboyer@Redacted>
Sent: Monday, November 04, 2019 11:34 AM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: NSPS OOOOa and CEDRI

Amy or Karen,

Can you tell me if O&G operators are required to use CEDRI for NSPS OOOO or OOOOa reporting?

Regards,
Brian E. Boyer
Environmental Consultant
BTGap, L.L.C.
337.356.9856